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January 28, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court’s order by memorandum endorsement of November 23, 2021, ECF No. 7383, I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to bring the Court up to date on the status of the parties’ efforts to propose redactions in accordance with the Court’s November 24, 2020 order, ECF No. 6541. The Plaintiffs’ Executive Committees (“Plaintiffs”), the Federal Bureau of Investigation (“FBI”), and Defendant Dallah Avco all join in this letter.

On December 23, 2021, Saudi Arabia circulated to the parties proposed redactions for the sealed filings leading up to the Court’s June 15, 2021 Order. Earlier today, Saudi Arabia circulated to the parties proposed redactions for the sealed filings leading up to the Court’s August 27, 2020 Order. Saudi Arabia will continue to circulate proposed redactions to outstanding sealing filings as appropriate.

On January 26, 2022, the FBI proposed that the parties submit revised redactions of sealed filings reflecting additional releases of previously protected information pursuant to section 2(b) of Executive Order 14040. Saudi Arabia has agreed to re-review documents for which Saudi Arabia was the filing party and to make a good faith, reasonable effort to identify previously proposed redactions that should be lifted because the relevant FBI documents have now become publicly available, understanding that the FBI is ultimately responsible for the accuracy of redactions for FBI protected material. Saudi Arabia will suggest modified redactions for FBI protected material in its own filings on a rolling basis.

Plaintiffs are continuing to review the redactions Saudi Arabia proposed on December 23, 2021 and have not yet had an opportunity to review the redactions Saudi Arabia circulated today.

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Dallah Avco is continuing to review the proposed redactions that Saudi Arabia circulated on December 23, 2021, and has not yet had an opportunity to review those circulated by Saudi Arabia earlier today.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before February 28, 2022.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)